

Gillian M. Ross, Bar No. 127116
Eugene M. Pak, Bar No. 168699
Gregory K. Jung, Bar No. 203350
WENDEL, ROSEN, BLACK & DEAN LLP
1111 Broadway, 24th Floor
Oakland, California 94607
Telephone: (510) 834-6600
Fax: (510) 834-1928
Email: epak@wendel.com

Attorneys for Defendants
Mohammed Karwash and Hassan Ibrahim

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BELCAN ENGINEERS,

Plaintiff,

vs.

MOHAMMED KARWASH, TOM LINN
dba TOM LINN DRAFTING & DESIGN,
JOSE JIMENEZ dba J&M DESIGN,
WILEY R. CHITWOOD, HASSAN C.
IBRAHIM, and SOUTHWAY
ENGINEERING & CONSTRUCTION,

Defendants.

Case No. 3:09-CV-02891 EDL

**STIPULATED MOTION TO AMEND
CASE MANAGEMENT CONFERENCE
ORDER SCHEDULE
[L.R. 16-2]**

Pursuant to Local Rule 16-2(d), Plaintiff Belcan Engineers (“Plaintiff”) and Defendants Mohammed Karwash and Hassan Ibrahim (“Defendants”) (collectively referred to as the “Parties”) hereby stipulate and jointly request that the deadlines in this action be extended.¹ Good cause exists for such extension as the Parties have reached a settlement and are in the process of memorializing this settlement in writing, and Defendant Mohammed Karwash is out of the country on an extended trip. In light of this, the Parties respectfully request that the Court’s

¹ The other defendants in this action have not appeared and have defaulted.

October 14, 2011 Case Management Conference Order be amended to re-set deadlines. The Parties request that the current deadlines in this action be re-set for three months as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery Cut-Off	April 27, 2012	July 27, 2012
Expert Disclosure	June 1, 2012	September 1, 2012
Rebuttal Expert Disclosure	June 20, 2012	September 20, 2012
Joint Statement	July 6, 2012	October 5, 2012
Further Status Conference	July 13, 2012 at 10:30 a.m.	October 12, 2012 at 10:30 a.m.
Expert Discovery Cutoff	July 20, 2012	October 19, 2012
Dispositive Motion Deadline	August 3, 2012	November 2, 2012
Meet and Confer	October 23, 2012	January 22, 2013
Pretrial Conference	October 23, 2012 at 3:00 p.m.	January 22, 2013 at 3:00 p.m.
Trial	November 5, 2012	February 4, 2013 at 9 a.m. (3 days)

SO STIPULATED BY:

Dated: April 23, 2012

WENDEL, ROSEN, BLACK & DEAN LLP

By: /s/ Eugene M. Pak

Eugene M. Pak
Attorneys for Defendants
Mohammed Karwash and Hassan Ibrahim

Dated: April 23, 2012


THE MORALES LAW FIRM

By: /s/ David P. Morales

David P. Morales
Attorneys for Plaintiff
Belcan Engineers

PURSUANT TO STIPULATION, IT IS SO ORDERED, with the exception that the meet and confer date is extended from September 17, 2012 (see Doc. No. 81)¹ to December 17, 2012.

Dated: April 27, 2012

: 
Judge Maxine M. Chesney
United States District Court Judge

Wendel, Rosen, Black & Dean LLP
1111 Broadway, 24th Floor
Oakland, CA 94607

¹It appears the parties, in listing October 23, 2012 as the current meet and confer deadline, were relying on the Clerk's minutes (Doc. No. 80), which contain a typographical error with respect to said deadline. The correct date is set forth in the Court's Pretrial Order (Doc. No. 81).